

IN THE UNITED STATES DISTRICT COURT
OF NEW MEXICO

Barbara Andersen
Plaintiff

v.
Jack Stuef

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Case 20-cv- 00553-JFR

**MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT AGAINST JACK
STUEF AS SUBSTITUTE DEFENDANT FOR THE PREVIOUSLY NAMED
“UNKNOWN DEFENDANT”**

Barbara Andersen, as her own attorney, hereby files this motion for leave to file the Second Amended Complaint against Jack Stuef, as the substitute defendant for the previously named “Unknown Defendant”. In support of the motion, Andersen states as follows”

1. Andersen has received the name of the Unknown Defendant, i.e. the purported “Finder”/Solver of the Fenn treasure chest.

2. In lieu of addressing the matter with Andersen private and in a verified fashion with Andersen, a Fenn family member (not the personal representative) went on a media circus adding more nonsense to the legitimacy of the solve and/or it being in Wyoming and/or that Stuef was the true “Finder”/“Solver”. This is consistent with the pranking theme/solve to the book (as discussed by Andersen in prior pleadings before this Court). Specifically, just as one solves the Fenn puzzle/poem by the subtle details that do not make sense, the Fenn estate/Stuef have overtly denied Andersen’s solve in an unverified fashion... yet at the same time teasing/taunting Andersen with subtle details. In other words, they undermine themselves and their overt representations with subtle, contradictory hints... just as the book does relative to the true puzzle solve. In other words, it is appearing more and more likely that Stuef is a spoof writer and that this is a prank end relative to Andersen and the nation.

3. However, despite same, counsel for Stuef continue to dodge Andersen and her inquiries. As such, Andersen is filing an alternative count for unjust enrichment.

4. Andersen questions whether Stuef is being used to stall Andersen for a potential book and/or movie relative to her and the Chase. Andersen will be asking for discovery relative to same as well. Either way, Stuef wrongfully claims ownership in a chest that has nothing to do with the correct solve of the puzzle... which is clearly in New Mexico where Andersen has been since 2018

5. As such, Andersen is hereby tendering a Second Amended Complaint adding a claim for unjust enrichment against Stuef and potential, unknown defendants relative to the treasure chest and the potential usage of personal and/or proprietary information.

Wherefore, Andersen hereby files this motion for leave to file the attached Amended Complaint in this matter.

Respectfully submitted:

/s/ Barbara Andersen

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CERTIFICATE OF SERVICE

Barbara Andersen hereby certifies that on December 30, 2020 the **MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT TO SUBSTITUTE JACK STUEF AS DEFENDANT IN PLACE OF THE “UNKNOWN DEFENDANT”** was filed and delivered via the ECF filing system to:

Service list:
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/s/Barbara Andersen
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(Filed remotely from 8860 Dawn Haven Road, Northport, Michigan.)